

ATTORNEY DOCKET NO  
1480 - CA

PATENT  
U.S. 10/828,816

### Remarks/ Arguments

In response to the Office Action mailed January 4, 2007, Applicants respectfully request that the Examiner reconsider the rejections of the claims. Applicants note with appreciation the allowance of Claims 13 - 25 and the allowability of Claims 2, 3, and 12.

Claims 1 - 25 remain.

Claim 1 is being amended.

Claims 1 - 6 stand objected-to due to an informality in independent Claim 1. Claim 1 has been amended as suggested by the Examiner to correct this informality.

Claims 1, 4, and 8 - 11 stand rejected under 35 U.S.C. § 102(b) as being anticipated by *Lin*. (U.S. Patent 6,501,234) (hereinafter "the *Lin* reference"). Applicants respectfully traverse these rejections.

Anticipation rejections under 35 U.S.C. § 102(b) require identity of invention. In other words, each and every feature of each and every claim rejected as anticipated must be shown in a single prior art reference. Applicants respectfully note that Claims 1, 4 and 8 - 11 include features not shown in the *Lin* reference.

Specifically, independent Claims 1 and 8 include the features that a pulse width modulation stage that drives one terminal of a full-bridge output load with a first pulse width modulated data stream and another terminal of the full-bridge output load with a second pulse width modulated data stream, wherein the second pulse width data stream is the complement of the first pulse width modulated data stream and is delayed such that edges of the first and second pulse width modulated data streams are temporally spaced.

In contrast, the pulse width modulator of FIGURE 2 of the *Lin* reference drives a set of independently regulated single-ended loads 18, such as cold cathode fluorescent lamps with corresponding phase shifted signals. (*Lin* reference, Col. 4, Lines 63 - 68). In other words, the *Lin* reference does not teach driving two terminals of a full-bridge

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load with corresponding complementary pulse width modulated signals having edges temporally spaced.

In the Background section of the present application, Applicants discuss U.S. Patent No. 6,373,336 to *Anderskouv et al.* (hereinafter "the *Anderskouv* reference"). Applicants provide herewith an Information Disclosure Statement, and appropriate fee, formally submitting the reference to the Examiner. Applicants now provide the following remarks distinguishing the teachings of the *Anderskouv* reference from the present claimed invention.

According to the principles of the present invention, as defined by the amended claims set forth above, a single PWM stage is utilized to generate first and second complementary PWM signals from a corresponding input signal. The second PWM signal is then selectively delayed such that edges of the first and second PWM are temporally spaced. The utilization of a single PWM stage to generate the first and second PWM signals from the input signal advantageously guarantees that, after introduction of the delay into the second PWM signal, the edges of the PWM signals driving the full-bridge load will not coincide. By maintaining temporal separation between the PWM edges, noise and distortion in the ultimate output signal are reduced.

In contrast, the system disclosed in the *Anderskouv* reference utilizes two separate PWM stages (labeled PWM A and PWM B in Figure 4) that generate two independent PWM signals from a single input signal. One significant disadvantage of this configuration is that statistically the edges of the two independent PWM signals can temporally coincide, even after a delay is applied to the output of the PWM B stage.

Applicants respectfully request that the *Anderskouv* reference be considered by the Examiner and that the amended claims be allowed in view thereof.

No new matter has been added; the claims have been merely amended to more particularly claim the subject matter Applicants believe is inventive. Applicants respectfully submit that the Claims as they now stand are patentably distinct over the art cited during the prosecution thereof.

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Applicant respectfully requests a Second Month Extension of Time to File this Response. Enclosed with this response is Form PTO/SB/22 with Extension Fees in the amount of \$450.

With the addition of no new claims, no additional filing fees are due. However, the Commissioner is hereby authorized to charge any fees or credit any overpayment to Deposit Account Number 20-0821 of Thompson & Knight LLP.

If the Examiner has any questions or comments concerning this paper or the present application in general, the Examiner is invited to call the undersigned at (214) 969 - 1749.

Respectfully submitted,

Thompson & Knight LLP  
Attorneys for ApplicantBy:   
James J. Murphy  
Reg. No. 34,5031700 Pacific Avenue  
Suite 3300  
Dallas TX. 75201 - 4693  
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